

To Whom It May Concern,

As a pilot flying tours in Hawaii under the current SFAR 71, I would like to address certain issues that I feel effect safety and why the SFAR 71 should be repealed to increase the safety of this particular flying environment. These concerns are as follows:

1) As the SFAR 71 was motivated more by noise abatement than any other issue, pilots often have to be faced with the choice between cloud or terrain clearances and those of noise abatement. Of course one should not break any of the rules but being faced with such choices in flight pilots often worry more about their license and livelihood than more important issue. Basically, the SFAR 71 can adversely affect pilot judgement and therefore effect safety.

2) The present route structures tend to concentrate air traffic too densely in certain areas presenting greater midair potential. Examples includes the Pahoia NDB and the "Mill" in Hilo. At htese points a pilots must be between frequecies or off communication frequencies to monitor ATIS in very critical areas. This is also a concern in narrow valleys where SFAR 71 terrain clearances must be adhered to making what would be a safe environment more hazardous.

3) In combination the two preceding points add to pilot workload and fatigue further comprimising safety.

In closing, SFAR 71 may have been instituted with the best of intentions to appease public concerns over noise only to have a worse effect on an industry that for the most part always strives to make safety the highest priority. In my opinion as a pilot flying tours in Hawaii, the SFAR 71 sometimes makes it difficult for the industry to maintain that priority. So, my view is that the SFAR 71 is outdated and was ill concieved and should be repealed to enable pilots to make more sound decisions on the side of safety.

Sincerely,

Timothy N. Perry